

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE: §
§
TEXAS STANDARD OIL COMPANY, §
§
Debtor. §

CASE NO. 08-34031
CHAPTER 11

**MOTION BY TEXAS STANDARD OIL COMPANY TO
EXTEND TIME TO ASSUME OR REJECT LEASE**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN FIFTEEN (15) DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

COMES NOW, Texas Standard Oil Company, the Debtor and Debtor In Possession in the above styled Chapter 11 case and for its Motion to extend time to assume or reject lease pursuant to 11 U.S.C. §365(d)(4) respectfully represents as follows:

1. The instant Chapter 11 case was filed on June 26, 2008 (the “Petition Date”), and at all times thereafter the Debtor has operated its business as debtor in possession.

2. As reflected in the Schedules filed in this case, the Debtor is the lessee under that certain Office Lease Agreement dated February 11, 2002 and amended May 20, 2008, with MS Crescent Nine Greenway SPV, LLC (successor-in-interest to Crescent Estate Funding III, L.P.), for the use and occupancy of Nine Greenway Plaza, Suite 3030, Houston, Texas 77046 (the "Office Lease").

3. Currently the Debtor is negotiating the provisions of a plan of reorganization that would comply with the provisions of 11 U.S.C. §1129(a). Thus, it is uncertain at this time whether pursuant to a plan the Office Lease will be assumed or rejected. In the meantime, the Debtor has complied with all provisions of the Office Lease, including the payment of all rent that has currently become due. Moreover, as reflected in the Debtor's monthly operating reports, all debts incurred during the Chapter 11 case are being paid currently according to terms.

4. Pursuant to 11 U.S.C. §365(d)(4) if a lease of nonresidential real property is not assumed within 120 days of the Petition Date, the lease will be deemed rejected and the lessee is thus required to immediately surrender possession of the property. In the instant case the 120-day period will end on October 24, 2008. However, upon a motion duly made and order entered within the 120-day period, the time during which the lease can be assumed or rejected may be extended for an additional 90 days.

5. The Debtor's business operations have an intrinsic value as reflected by its positive cash flow during the Chapter 11 case. If the Debtor is required to surrender possession of its main base of operations before the proposal and confirmation of a plan the value of its business will be greatly impaired and the financial commitments required for a feasible plan may not be forthcoming.

WHEREFORE, PREMISES CONSIDERED, Texas Standard Oil Company prays that the period of time during which the Office Lease may be assumed or rejected be extended for a period of 90 days from October 24, 2008 to January 22, 2009, and that it have such other and further relief as is just.

Respectfully Submitted,

/s/ Heather McIntyre

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served via ECF and/or first class US Mail, postage prepaid, as indicated, on the parties listed on the attached Service List on September 19, 2008.

/s/ Heather H. McIntyre

Heather H. McIntyre